



McLAUGHLIN GORMLEY KING COMPANY

1734 Alhambra Avenue • Martinez, CA 94553 USA
(925) 370-1360 • Fax: (925) 370-1340 • www.bill.chase@mgk.com

RECEIVED
USDA NATIONAL
ORGANIC PROGRAM

2005 AUG 11 A 7:52

3 August 2005
National Organic Program
Sunset Review
Docket Number TM-04-07
FAX: 202-205-7808

Mr. Arthur Neal, Director
Program Administration
National Organic Program
USDA-AMS-TMO-NOP
1400 Independence Avenue, S.W., Room 4008
South AG Stop 0268
Washington, D.C. 20250

Dear Mr. Neal and National Organic Standards Board,

This letter is in response to the publication of the Federal Register advance notice of proposed rulemaking (ANPR) in FR Volume 70, No. 116, June 17, 2005, concerning the sunset review of the National List that will expire on October 21, 2007.

STATEMENT OF INTEREST

The McLaughlin Gormley King Company (MGK®) is a small, family owned chemical company that has been in business since 1902. The Company has fewer than 100 employees. The cornerstone of our company is the botanical insecticide, Pyrethrins. MGK owns and operates one of four (4) pyrethrins refineries in the world. It is located in Chaska, Minnesota. We have developed hundreds of insecticide products that contain Pyrethrins and we have a large number of products that contain Pyrethrins registered with the United States Environmental Protection Agency (EPA). We also do business in many countries outside of the United States.

We have also developed MGK branded insecticide products for use in certified organic production. We have products registered with the EPA that are certified by the Organic Materials Review Institute (OMRI) and they also bear the NOP logo that has recently been approved by the EPA to identify these products as being useful in certified organic production. We also have products in development and seeking EPA registration that will be similarly certified for use in certified organic production and processing. This background is to demonstrate our interest in the National List and the continued allowance of substances that are found on the National List.

Quality Products Since 1902

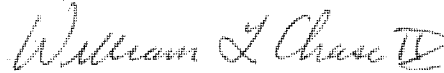
POSITION STATEMENT

MGK uses substances listed on the EPA inert ingredient list known as "List 4" as inert ingredients in the EPA registered insecticide products that are registered for use in certified organic production. These inert ingredients are essential to the performance and efficacy of the product and they were selected because they are OMRI certified and they appear on the National List. If we had to reformulate and register formula amendments, it would be costly to us and it would disrupt our customers who depend upon the products being available for use. It would also probably not be possible to achieve the proper emulsification, solution stability, and other essential characteristics that the present formulation provides.

As the composition of a registered pesticide product is Confidential Business Information, and because this letter will become a public document, we cannot reveal the identity of the specific ingredients that we use in our insecticide products. The substances are listed in Section 205.601 (m)(1) as "EPA List 4 – Inerts of Minimal Concern".

We strongly support their continued listing in the National List of Section 205.601 (m)(1) that permits the use of EPA list 4 inerts of minimal concern in products labeled for use in certified organic production.

Very truly yours,



William L. Chase, II, Director
Registration and Regulatory Affairs

wlc

cc: D. Carlson

K. Caskey

A. Umana

J. Schlekau

Organic Trade Association

NOPset1.doc